

COMPOSITE EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

JPMorgan Chase Bank, N.A.,

Defendant.

Case No. 1:22-CV-10019 (JSR)

**DECLARATION OF UNDERSIGNED CLASS MEMBER
IN SUPPORT OF SETTLEMENT**

Pursuant to 28 U.S.C. § 1746, I, as one of the undersigned Class Members, hereby declare as follows:

1. I was sexually abused by Jeffrey Epstein.
2. It is my understanding that the Court will hold a hearing on November 9, 2023, on whether to approve the settlement in this case. I therefore submit this declaration for the Court's consideration in support of the settlement.
3. I strongly support the \$290 million settlement that was reached in this case and ask that the Court give its final approval in all respects. This settlement will provide life-changing money for which I am sincerely grateful.
4. I have the following additional information to provide for the Court's consideration with respect to class counsel:

After decades of living under the darkest shadow that was Jeffrey Epstein, a light has emerged. It is with my deepest heartfelt gratitude to my counsel, the exceptionally brave women who spoke before me, and all legal counsel who have advocated for the

victims of this case, that I wish to share this with you today. For many years, I have been traumatized, haunted, and mentally tortured by the memory of being victimized by Jeffrey Epstein. I was cloaked in fear, not only due to Epstein's actions, but largely due to the network of supporters and people that enabled him to commit such heinous acts. Their knowledge, negligence, and lack of accountability rendered me feeling abandoned in my own worthlessness. It has taken me years of daily practice to begin to unmask the intense pain associated with his actions, and to try to reconcile the abject invisibility that I felt as his associates stood by idly. Finally, there may be a light at the end of an exceptionally long tunnel. This remarkable class action council has provided a space where our voices can be heard and matter. Through their care and compassionate handling of such sensitive matters, they have given me, and many others the courage to face these traumatic events and begin to heal from them. I am eternally grateful for these brave advocates and all others who fight for the justices for those of us who have felt silenced for so long. Although healing is a long and arduous process, with guidance and support, we will. Thank you for seeing us, and hearing us.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 2nd day of November, 2023.

/s/ Jane Doe 50
Jane Doe 50

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, individually and on behalf of
all others similarly situated,

Plaintiff,

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4. I have the following additional information to provide for the Court's consideration with respect to class counsel:

With profound gratitude, I wish to convey that I could never have summoned the strength to step into the light and share my harrowing story were it not for the remarkable valor displayed by my counsel. For too long, I have borne the heavy burden of shame, a

sense of worthlessness, and the enduring trauma stemming from the sinister web of Jeffrey Epstein's enablers and supporters. These scars have festered, manifesting in countless unhealthy ways over the past two decades, a silent torment most will never fathom.

Now, at long last, a legal advocate has emerged who has dedicated years to championing our quest for justice. Their expertise is matched only by the tenderness and sensitivity with which they handle our painful truths, making it clear that our voices matter. They have granted us the strength to reveal the narratives of grooming, manipulation, abuse, and the darkest abyss of trafficking. This class counsel has liberated me in ways words cannot encapsulate. I would never have embarked on the path to becoming whole again without their unwavering guidance and their profound courage to do what is right. They have bestowed upon us the gift of our own voices.

Today, I sense that we are collectively free to finally move forward with our lives, bearing less of the weight of our past and more of the strength of our healing. The magnitude of this transformation extends far beyond the comprehension of those outside of our ordeal. To all who have contributed to the mending of our shattered hearts, I offer my deepest gratitude.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 2nd day of November, 2023.

/s/ Jane Doe 101
Jane Doe 101

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, individually and on behalf of
all others similarly situated,

Plaintiff,

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4. I have the following additional information to provide for the court's consideration with respect to the class counsel:

For over fifteen years, class counsel has fought not only for me but for many other survivors victimized by Jeffrey Epstein. I have witnessed and been impacted by how they advocate for the best resolutions for survivors. They have worked tirelessly to ensure that we are

heard, supported, and empowered through this case. Although the pain that has been inflicted upon us will never go away, the fact that we have counsel fully invested in bringing justice has made a difference in many lives, including mine. Through this case, the team has shown not only in the courtroom but also outside of the courtroom how much they care. They are always there to pick up the phone, listen intently, spend hours explaining, and treat every survivor with the utmost respect. They have not just been counsel but also mentors and friends. Through the years, they have made it their mission to hold people accountable and bring them to justice, even when many others gave up the fight. In the darkest of days, they have been the light and showed that there are people still willing to fight for what is right. They have never given up on bringing justice for those impacted by Jeffrey Epstein and his coconspirators and ensuring justice so that crimes like the ones perpetuated upon us will never happen to someone again.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 2nd day of November, 2023.

/s/ Jane Doe 102
Jane Doe 102

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

JPMorgan Chase Bank, N.A.,

Defendant.

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4. I have the following additional information to provide for the Court's consideration with respect to class counsel:

When I first met with class counsel, I was at a difficult situation in my life that was caused by many years of anxiety and panic attacks, lack of self-esteem, weight and body image issues, and fear of anything that reminded me of the horrible experiences I've had

in my 20s as a survivor of sexual and emotional abuse. Sometimes I would wonder how to find emotional strength to move on in life. I can say now that the class counsel has given me so much support, care, and attention, helping me to go back safely to the traumatic memories I've had and to find inner peace and confidence to speak up for myself. The wonderful team of attorneys have been there for me all along, giving me hope to find out what happiness is now in my 40s, and to become a confident woman and a strong mother to my son.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

We, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 2nd day of November, 2023.

/s/ Jane Doe 103
Jane Doe 103

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

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Defendant.

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4. I have the following additional information to provide for the Court's consideration with respect to class counsel:

All Class Counsel are really kind, caring, hardworking, and very compassionate people. I met them at the most difficult times of my life when I was hiding myself and so scared. They have created such a safe space with empathy and understanding that has

finally encouraged me and has given me enough strength to finally break my silence and share all the pain and all the nightmares I have gone through and carried inside for too long!

I feel like Brittany and Brad are my guiding light and my hope! I consider myself incredibly lucky to have them by my side and advocating for me. I feel so overwhelmed with emotions and tears when trying to find the right words to express my gratitude for the presence of class counsel in my life.

I hope that the Court will appreciate so much all the hard work of class counsel and their endless support on seeking justice for sexually abused victims of Jeffrey Epstein who was left forever damaged and voiceless.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 2nd day of November, 2023.

/s/ Jane Doe 104
Jane Doe 104

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Plaintiff,

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4. I have the following additional information to provide for the Court's consideration with respect to the class counsel:

I am not sure there are words to put into context the incredible amount of gratitude I have for class counsel. They have gone to battle and fought for myself and all the survivors of JE like we were their own family. They have listened, provided support, were kind, caring,

professional, empathetic, and empowering. I always felt safe, comfortable, and cared for by everyone working for me. The settlement they achieved in this case is incredible and will make a huge and very positive difference in my life. I will be forever grateful for their tremendous effort on our behalf.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 2nd day of November, 2023.

/s/ Jane Doe 105
Jane Doe 105

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

JPMorgan Chase Bank, N.A.,

Defendant.

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4. I have the following additional information to provide for the Court's consideration with respect to the class counsel:

I understood before class counsel undertook to hold these banking institutions responsible that it was a longshot and would require skilled and tireless work from all of the lawyers involved. I am amazed at what they have done. Never in 1 million years did I think, or any

of the other survivors I know think, that there would be real accountability for the banks assisting Jeffrey Epstein in his abuse of us. I am forever grateful to all of the time that each and every attorney spent working on our behalf. The world should know there really are good people out there willing to dedicate their entire lives to helping bring peace to others. I was fortunate to be one of those people to benefit from the great lawyers that have helped us get some justice.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 2nd day of November, 2023.

/s/ Jane Doe 106
Jane Doe 106

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, individually and on behalf of
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Plaintiff,

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4. I have the following additional information to provide for the Court's consideration with respect to the class counsel:

I am writing to attempt to explain the level and depth of dedication The Crime Victim Law Firm has shown, not only in seeing that justice is served, in all matters relating to my abuse at the hands of Jeffrey Epstein, but in the level of compassion and sensitivity,

with which all members of this firm have addressed this incredibly difficult situation.

Within all the media frenzy around Jeffrey Epstein, his associates and the crimes committed, I have seen many counsel lose sight of the objective and become embroiled in the circus. Neither Brad Edwards, Brittany Henderson, nor any member of the Boies Schiller firm has ever lost sight of the primary purpose, to be impartial enablers of justice, placing principles over personalities.

On a personal note, having struggled with trust issues with men, as the direct result of my abuse by Jeffrey Epstein, my firsthand experience with Brad Edwards has been extremely instrumental on my healing journey towards believing good men exist. He has demonstrated time and time again that his ethics and integrity are on point and that, as a lawyer, he will stand up for me and for any woman who has been harmed in this way.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 2nd day of November, 2023.

/s/ Jane Doe 107
Jane Doe 107

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4. I have the following additional information to provide for the Court's consideration with respect to the class counsel:

I was flown to the Virgin Islands at the age of 18 where I found myself trapped with Jeffrey Epstein who sexually abused me, threatened me, and promised to ruin my future career in the fashion industry if I didn't do what he said. This traumatic experience, that we now

know to be a years long scheme of Jeffrey Epstein, ruined a big part of my life, my career, and left me with mental damages that I just recently was able to properly begin dealing with, and that will be part of me for the rest of my life. Jeffrey Epstein's crimes would not have been possible without his helpers, coconspirators, and the people and organizations that turned a blind eye—even if they knew what was going on. Too much money and power was at stake.

I learned that the Court will hold a hearing next week on whether or not to approve the settlement reached by the class counsel and I hereby want to voice my support of the settlement for the Courts consideration. The settlement reached in this case is an important step towards bringing justice to the victims that were harmed by the actions of Jeffrey Epstein and the network that made his crimes possible. I think I speak for many of us if I tell you that we want to find a timely solution for this particular case so that we can move forward. Every further delay, every day that we are uncertain about the outcome of this settlement means further harm and pain. Therefore, I ask the Court to give its final approval so that the funds can be distributed without delay. This settlement will provide assistance which can't bring back my youth, but it will make up for missed opportunities as well as pay for continued therapy.

I only have good things to say about all of the lawyers who represented the class. They always treated me with the upmost respect and sensibility for what I went through. I truly believe that they have the best intentions for the victims and that they have represented our interests in the best possible way and better than anyone else could have.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 2nd day of November, 2023.

/s/ Jane Doe 108
Jane Doe 108

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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4. I have the following additional information to provide for the Court's consideration with respect to the class counsel:

I was thirteen years old when Jeffery Epstein sexually assaulted me. This malicious abuse continued for another four years. Jeffery Epstein stole my virginity, my innocence, my childhood, and a very big part of me, which I will never get back. I'm stating this

because according to my knowledge, the Court will conduct a hearing on November 9, 2023, to determine whether to approve the settlement in this case. In support of the settlement, I therefore submit this declaration for the Court's consideration. I wholeheartedly support the settlement reached in this case and request that the court grant its final approval so that the funds can be distributed without delay to the class members. This settlement will result in life-altering funds for all its members, and for that I am entirely grateful. I am not sure how my lawyers were able to make this happen but I am so thankful that they did.

I have the following to say about the work performed by class counsel in this case and the positive contributions they have made to my life. This entire process has been curling yet handled with such sensitivity and care by the work class counsel. Brittany Henderson and Brad Edwards and all of the Class Counsel have been expectational in handling this sensitive case. They held my hand throughout the entire process, guided me, and provided me with resources to support my mental health and needs. I had never shared my story with anyone before and when I did, I'd never felt so safe exposing the worst moments of my life to complete strangers. Today I don't see them as just my class counsel but considered as friends. I'm truly grateful and fortunate to have such an expectational team supporting me through this difficult process.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.
Respectfully submitted this 2nd day of November, 2023.

/s/ Jane Doe 109
Jane Doe 109

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4. I have the following additional information to provide for the Court's consideration with respect to the class counsel:

I have the following to say about the work of class counsel. They have performed tremendously in this case and I have so many positive things to say about what they have done for me and my life. The whole team, from Brittany Henderson to the paralegal Maria

Kelljchian, they have been conscientious, discreet, professional, and they helped give me and others a real voice. Despite them being professional lawyers with integrity, their kindness and compassion have helped me through my arduous journey. Brittany Henderson with her patience and sensitivity made me open up for the first time since the abuse caused by Jeffrey Epstein in ways I never did before. I feel like I have a friend whom I could safely confide in. I am very grateful for her and for the work that has been done for me by all class counsel.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 2nd day of November, 2023.

/s/ Jane Doe 110
Jane Doe 110

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4. I have the following additional information to provide for the Court's consideration with respect to the class counsel:

I am eternally grateful to all the working class counsel that fought to bring justice to me, a Jane Doe, and countless others survivors. The assault that I endured at the hands of Jeffrey Epstein will never be erased from my mind. However, I take solace in knowing that there

are modern day heroes out there fighting, clawing their way to bring me justice. These heroes never stopped. I am genuinely grateful to them for their hard work, long days, sleepless nights, never-ending documents to read, note taking, emails, texts, phone calls, and encouraging words. They cared, they listened, and that means the world to me. I would like the Court to know that I am so thankful to class counsel for making a difference. I will never forget.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

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4. I have the following additional information to provide for the Court's consideration with respect to the class counsel:

The work of the class counsel has validated my experience and acknowledges the harm Jeffrey Epstein and the financial institutions that enabled him perpetrated in my life. I didn't grasp until much later, the magnitude of healing that comes from being seen and

understood by good lawyers who are willing to fight for me. Without the help of class counsel, I would not be where I am in my healing journey. I know that they worked tirelessly around the clock for a long time to fight for me and for the other members of the class. I am really grateful to class counsel and to everyone involved.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 2nd day of November, 2023.

/s/ Jane Doe 112
Jane Doe 112

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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4. I have the following additional information to provide for the Court's consideration with respect to the class counsel:

The lawyers representing this class were the first people who actually listened to what I had to say. They believed in me, my character, and have shown me compassion more than members of my own family. They've supported me through what has been some of the

most challenging times of my life and they've given me the opportunity to provide my daughter with the kind of life I never had. I have lost some of the closest people to me (my sister and my daughter's father) because of the media coverage of this case and the circumstances that made me a class member, and if not for class counsel I am not sure I would be here to write this for the Court.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 2nd day of November, 2023.

/s/ Jane Doe 113
Jane Doe 113

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2. It is my understanding that the Court will hold a hearing on November 9, 2023, on whether to approve the settlement in this case. I therefore submit this declaration for the Court's consideration in support of the settlement.
3. I strongly support the \$290 million settlement that was reached in this case and ask that the Court give its final approval in all respects. This settlement will provide life-changing money for which I am sincerely grateful.
4. I have the following additional information to provide for the Court's consideration with respect to the class counsel:

The lawyers who represented this class of victims in this case have been so great every step of the way. As difficult as it was to relive and talk about this traumatic time of my life, the hard work they have done on my behalf and the behalf of all Epstein survivors is truly

amazing. Brittany was so sincere and patient with me, and spoke to me for countless hours. She made me feel comfortable and safe and listened to me cry for days. Anytime I had questioned or needed a lawyer to help me, counsel me, be there for me, class counsel was there, every single time. I cannot imagine any lawyers have ever worked harder for a group of people than these lawyers have worked on this case for us. Without Brittany and Brad I would still be living a hopeless and sad life of pain. For their work and all the lawyers who sacrificed their own time and life for me and others, I'm forever grateful. The team of lawyers that makes up all class counsel has genuinely changed the lives of hundreds of survivors of Jeffrey Epstein for the better.

5. If there is anything else I can provide the Court in support of its consideration of the settlement, I am happy to provide it.

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 2nd day of November, 2023.

/s/ Jane Doe 114
Jane Doe 114